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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

LA TIENDITA and THANH T. HUYNH,	)	Case No. 5:14-cv-01693 HRL
	)	
Plaintiffs,	)	STIPULATION AND PROTECTIVE ORDER
	)	
v.	)	
	)	
UNITED STATES DEPARTMENT OF	)	
AGRICULTURE,	)	
	)	
Defendant.	)	
	)	

Subject to the approval of this Court, the parties hereby stipulate to the following protective order:

The parties agree that entry of the following protective order is necessary in order to insure the integrity of the SNAP program. The parties therefore request that the Court enter the following stipulated protective order.

STIPULATED PROTECTIVE ORDER

All documents and electronically stored information produced by defendant in this action Which are designated in writing as being "Produced Under Protective Order" (the "Protected

**\*Only information deserving of protection may be so designated. Mass, indiscriminate designations are prohibited.**  
STIPULATION AND PROTECTIVE ORDER  
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Documents") shall be subject to the following restrictions:

1. All information therein, except the training guides, shall be used only for the purpose of this litigation and not for any other purpose; The training guides are not subject to this protective order.

2. No information therein shall be disclosed to anyone other than (a) the attorneys employed by plaintiff and its staff; (b) the parties and their spouses; (c) actual or potential third-party witnesses; (d) outside experts or consultants retained by any of the parties or their counsel for purposes of this litigation; (e) the Court in further proceedings herein; <sup>(f)</sup> ~~(f)~~ stenographic deposition reporters; and (g) other persons upon whom the parties mutually agree in writing. Any documents which have been produced prior to legal action having been filed in this matter on April 11, 2014 shall not be subject to this protective order and are not considered protected documents. These documents are comprised of the exhibits filed by Plaintiffs as a part of their complaint and request for a temporary restraining order.

3. There shall be no reproduction of the Protected Documents except that, as required by the litigation, copies, excerpts, or summaries may be shown to those authorized in Paragraph 2; Counsel may, however, scan copies and retain them as pdf documents if that is a normal practice of that office.

4. Except as otherwise provided in Paragraphs 2 and 3, all of the Protected Documents produced to plaintiffs shall remain in the custody of plaintiffs' attorneys of record during the pendency of the litigation;

5. Upon conclusion of the case, counsel for the plaintiff may retain copies of the produced documents in a confidential and segregated location for the period of time that he is required to by State Bar rules; and

6. This Stipulation and Protective Order is without prejudice to the right of any party to seek modification of it from the Court. It shall remain in effect until such time as it is modified, amended or rescinded by the Court and shall survive termination of this action. The Court shall have continuing jurisdiction to modify, amend, rescind or enforce this Stipulation and Protective Order ~~notwithstanding~~ <sup>for a period of six months after</sup> the termination of this action.

7. Any party seeking to file Protected Documents under seal shall comply with Civil L.R. 79-5.

8. All disclosure and discovery disputes are subject to the undersigned's Standing Order re Civil Discovery Disputes.

STIPULATION AND PROTECTIVIE ORDER  
LA TIENDITA V. USDA, CASE NO. 5:14-CV-01693 HRL

1 DATED: May 5, 2014

2 MELINDA HAAG  
3 United States Attorney

4 /S/ \_\_\_\_\_  
5 James A. Scharf  
6 Assistant United States Attorney  
7 Attorney for Defendant USDA

8 DATED: May 5, 2014

9 /S/ \_\_\_\_\_  
10 Thomas Spielbauer  
11 Attorney for Plaintiffs

12 PURSUANT TO STIPULATION, IT IS SO ORDERED:

13 DATED: May 14, 2014

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16 Hon. Howard A. Lloyd  
17 United States Magistrate Judge  
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